

Exhibit 44

(REDACTED)

This Exhibit contains the specific pages of the deposition Plaintiffs are referencing. The entire deposition was separately filed in the record pursuant to LR 5.1 and the M.D. Ga. CM/ECF Administrative Procedures Manual.

IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF GEORGIA
COLUMBUS DIVISION

WILHEN HILL BARRIENTOS,)
ET AL.,)
)
Plaintiffs,)
) CIVIL ACTION FILE
vs.)
) NO: 4:18-CV-00070-CDL
CORECIVIC, INC.,)
)
Defendant.)

DEPOSITION OF FREDDIE HOOD

ATLANTA, GEORGIA

FRIDAY, OCTOBER 22, 2021

(Reported Remotely)

REPORTED BY: TANYA L. VERHOVEN-PAGE,
CCR-B-1790

JOB NO. 200838

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October 22, 2021

9:00 a.m.

Deposition of
FREDDIE HOOD, held in Atlanta,
Georgia before Tanya L. Verhoven-Page,
Certified Court Reporter and Notary Public
of the State of Georgia.

APPEARANCES OF COUNSEL

On behalf of the Plaintiffs:

SOUTHERN POVERTY LAW CENTER

400 Washington Avenue

Montgomery, Alabama 36104

BY: CAITLIN SANDLEY, ESQ.

REBECCA CASSLER, ESQ.

On behalf of the Defendant:

STRUCK LOVE BOJANOWSKI & ACEDO

3100 West Ray Road

Chandler, Arizona 85226

BY: JACOB LEE, ESQ.

1 F. HOOD

2 BY MS. SANDLEY:

3 Q Mr. Hood, do you -- do you recall this
4 account now, looking at it?

5 A Yes, ma'am.

6 Q Is this a fair and accurate depiction of
7 your LinkedIn account profile?

8 A Yes, ma'am.

9 Q Do you maintain this account?

10 A I haven't been on it in a while, but yes,
11 it's my account.

12 Q So you created it, right?

13 A Yes, ma'am.

14 Q And did you input the information into
15 the profile?

16 A Yes, ma'am.

17 Q Well, let's walk through your positions
18 at CoreCivic.

19 MS. SANDLEY: Rebecca, can you
20 scroll down. So let's start, actually,
21 at the bottom, at Detention Officer.

22 BY MS. SANDLEY:

23 Q Okay. So you started as CoreCivic in
24 July 2007; isn't that right?

25 A Yes, ma'am.

1 F. HOOD

2 Q I want you to take a look at what you
3 listed here as your duties as a detention officer.

4 Does this list reflect your job duties as
5 a detention officer?

6 A It reflects some of the duties, yes,
7 ma'am.

8 Q What other duties did you have that
9 aren't listed here?

10 A Basically, any other jobs that was asked
11 of me to perform by my supervisor.

12 Q Who was your supervisor when you were a
13 detention officer?

14 A Ma'am, that was 2007. I can't even
15 remember, to be honest.

16 Q Do you recall what their title was, what
17 their position was?

18 A It was a captain. We worked for the
19 captains and the lieutenants, yes, ma'am.

20 Q And so then in March 2009, is that right,
21 you were promoted to shift lieutenant?

22 A Yes, ma'am.

23 Q And take a look at these duties. Does
24 this list of duties reflect all of your
25 responsibilities as a shift lieutenant at Stewart?

1 F. HOOD

2 A Yes, and any other duty that was asked of
3 me by a supervisor.

4 Q And who was your supervisor when you were
5 a shift lieutenant?

6 A Again, 2009, you know, we had different
7 captains on different shifts. So I can remember
8 probably maybe one or two, but I can't remember all.
9 We had six captains.

10 Q Okay. But you reported to the captains?

11 A Yes, ma'am. The lieutenant worked with
12 the captain.

13 Q And then going up, in April 2011 you were
14 promoted to shift captain?

15 A Yes, ma'am.

16 Q Now take a look at these duties. Does
17 this list include all of your responsibilities as a
18 shift captain?

19 A The majority of the responsibility.
20 Again, like I say, any other assignment that was
21 tasked to me by -- you know, by my superior, but
22 yeah, this lists some of the job responsibilities.

23 Q Okay. When you were a shift captain, who
24 did you report to?

25 A The assistant chief of security.

1 F. HOOD

2 Q All right. So let's scroll up.

3 So then you were -- then you became a

4 unit manager in August 2013, right?

5 A Yes, ma'am.

6 Q Was that a promotion?

7 A Like a lateral promotion. It wasn't a
8 pay increase. It was, basically I went from the
9 security side to basically the unit management side
10 of the house.

11 Q Okay. And does this list of
12 responsibilities reflect all of your job duties when
13 you were a unit manager?

14 A It reflects some of the job duties.
15 Again, if I placed all of the job responsibilities in
16 there, I would probably have four or five pages, but
17 it reflects some of the duties and responsibilities
18 as a unit manager.

19 Q Who did you report to when you were a
20 unit manager?

21 A The chief of unit management.

22 Q Do you recall who that was?

23 A Droydred Blackmon.

24 Q And did you supervise anyone else when
25 you were a unit manager?

F. HOOD

detainees, the only thing they were responsible for cleaning was their room, per the handbook. That's the only thing that they had to clean if they weren't a part of the voluntary work program, their living area.

Q What types of rewards would you give?

A Like I said, we would do pizza parties for the whole pod. We would bring in like items -- ice cream, things of that nature, popcorn.

Q Okay. Was it always food items?

A Yes, ma'am. Mostly, you know, video -- we did video games, movies, movie nights, things like that, but mostly -- it was mostly food items. They would request things that -- you know, that they couldn't get on the inside, from the outside we would try to get that to them.

Q All right. And then going to the top,

May 2015 you became assistant chief of security; is that right?

A Yes, ma'am.

Q And you were in that position for about five years?

A Yes, ma'am.

Q And does this list of job duties

1 F. HOOD

2 been difficult to make meal service on time if no
3 kitchen workers had showed up?

4 MR. LEE: Form and foundation.

5 THE WITNESS: No, ma'am. Again,
6 with the voluntary work program, you know
7 we -- the facility would -- would

8 function. Like I said, we had times when
9 we were low on numbers with detainees and
10 staff members would have to go to the
11 kitchen and prepare the meals.

12 So the facility is going to be on
13 schedule.

14 BY MS. SANDLEY:

15 Q Was the number of detained workers
16 available to work in the kitchen a concern of yours?

17 MR. LEE: Object to form.

18 THE WITNESS: Could you repeat
19 that?

20 BY MS. SANDLEY:

21 Q Was the number of detained workers
22 available to work in the kitchen a concern of yours?

23 MR. LEE: Object to form.

24 THE WITNESS: When you say detained
25 workers, the detainees weren't detained

1

F. HOOD

A horizontal bar chart consisting of 20 black bars of varying lengths. The bars are arranged in a single column, with some being significantly longer than others, creating a jagged silhouette. The longest bars are the 10th, 11th, and 12th from the top, while the shortest is the 15th. The bars are evenly spaced vertically.

1

F. HOOD

Bar Index	Approximate Length (%)
1	95
2	100
3	85
4	90
5	88
6	95
7	90
8	45
9	95
10	65
11	98
12	98
13	90
14	35
15	45
16	95
17	15
18	95
19	98
20	88
21	75
22	90
23	98

1

F. HOOD

A horizontal bar chart consisting of 20 black bars. The bars are arranged vertically, one above the other. Their lengths vary significantly, representing a distribution of data. The longest bar is the 6th one from the top, extending across the entire width of the chart. Other bars of varying lengths are scattered throughout the set, with the shortest bar being the 3rd one from the top.

23 Q Let's go to the next exhibit. This will

1

F. HOOD

Bar Index	Approximate Length (%)
1	40
2	95
3	100
4	98
5	70
6	90
7	20
8	55
9	45
10	95
11	80
12	88
13	98
14	50
15	98
16	20
17	88
18	98
19	82
20	100
21	100
22	20
23	78
24	95

1

F. HOOD

Bar Index	Approximate Length (%)
1	25
2	95
3	98
4	85
5	99
6	100
7	30
8	97
9	28
10	88
11	22
12	35
13	92
14	32
15	97
16	35
17	100
18	18
19	95
20	97
21	100
22	80
23	38
24	45

1

F. HOOD

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

1

F. HOOD

Bar Index	Approximate Length (%)
1	35
2	100
3	40
4	38
5	100
6	48
7	38
8	100
9	28
10	95
11	25
12	100
13	25
14	35
15	100
16	28
17	35
18	100
19	45
20	35
21	100
22	42
23	35
24	100

1

F. HOOD

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

1

F. HOOD

[REDACTED]

[REDACTED]

[REDACTED]

5 Q Are all the tasks we just discussed
6 necessary to maintain the safety and cleanliness of
7 Stewart?

8 A Yes, ma'am.

9 Q And do they contribute to the general
10 upkeep of the Stewart facility?

11 A Yes, ma'am.

12 Q Would it be a problem if these jobs
13 didn't get done?

14 MR. LEE: Object to form.

15 THE WITNESS: It wouldn't be a
16 problem. Are you referring to if a
17 detainee didn't clean them?

18 BY MS. SANDLEY:

19 Q No, if anyone didn't clean them. Would
20 that be a problem?

21 MR. LEE: Objection to form.

22 THE WITNESS: I wouldn't think it
23 would be a problem. It would be an
24 issue. It would show a lack of
25 leadership, you know, sanitation and

1 F. HOOD

2 things of that nature.

3 General cleanliness says a lot

4 about a facility. If you come into an

5 area and the area is looking good, you

6 know, you think the facility is looking

7 good. But if you go into an area and

8 it's dusty or dirty, then, you know, your

9 mind says the whole facility looks the

10 same.

11 So it wouldn't be a problem. It

12 would be an issue.

13 BY MS. SANDLEY:

14 Q So, for example, if the medical unit was
15 dirty, would the warden be concerned about that?

16 MR. LEE: Form and foundation.

17 THE WITNESS: Yeah, that's a
18 question that you have to ask the warden.

19 I wouldn't be able to know that. I
20 wouldn't be able to answer that for the
21 warden.

22 BY MS. SANDLEY:

23 Q When you were assistant chief of
24 security, did you work to make sure the medical unit
25 was clean?

1

F. HOOD

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

15 Q All right. We can take this down. We're
16 going to do a couple more exhibits and then let's
17 take a break, all right?

18 A Okay.

19 Q CoreCivic was required to get written
20 waivers from ICE when it -- in order to depart from
21 the PBNDS requirements, right?

22 MR. LEE: Form and foundation.

23 THE WITNESS: Stewart Detention

24 Center got a waiver to assist with

25 kitchen workers when the population

1 F. HOOD

2 change started.

3 BY MS. SANDLEY:

4 Q Uh-huh. Yeah, so that waiver was from
5 ICE, right?

6 A Yeah, Stewart Detention Center, not
7 CoreCivic.

8 Q Okay. But CoreCivic owns and operates
9 Stewart Detention Center, right?

10 A Yes, but CoreCivic had multiple
11 facilities, you know, across the United States. So
12 I'm only aware of Stewart and their waiver. I can't
13 say CoreCivic, that that would apply to all CoreCivic
14 facilities. I don't know about all the CoreCivic
15 facilities.

16 Q Understood. So at Stewart, when the
17 staff needed to depart from the PBNDS, the staff had
18 to get a waiver from ICE, right?

19 MR. LEE: Object to form.

20 THE WITNESS: Not staff. The
21 facility, due to the population change,
22 when more high custody detainees came in
23 as opposed to low custody detainees, then
24 yes, a waiver was asked to assist with
25 the workers in the facility.

1 F. HOOD

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3 BY MS. SANDLEY:

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5 ICE, right?

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11 facilities, you know, across the United States. So
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13 say CoreCivic, that that would apply to all CoreCivic
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17 staff needed to depart from the PBNDS, the staff had
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20 THE WITNESS: Not staff. The
21 facility, due to the population change,
22 when more high custody detainees came in
23 as opposed to low custody detainees, then
24 yes, a waiver was asked to assist with
25 the workers in the facility.

1 F. HOOD

2 BY MS. SANDLEY:

3 Q Were you involved in requesting that
4 waiver?

5 A I had -- I remember having knowledge. I
6 wouldn't say involved. I never spoke to ICE because
7 that was above my pay grade.

8 Q Were you involved in any conversations
9 about the need for that waiver?

10 A Yes.

11 Q Okay. And what -- who did you talk to
12 about that waiver?

13 A Probably the chief of unit management,
14 the AW. I think that was who. Maybe the chief and
15 the AW, we sat down and talked, and to include the
16 warden at the time.

17 Q Did you agree that y'all needed that
18 waiver in order to staff the kitchen?

19 A I agree we needed the waiver to staff
20 multiple positions, not just the kitchen position,
21 but, you know, multiple positions throughout the
22 facility.

23 Q What other positions were you able to
24 staff after you got that waiver?

25 A Hallway details.

1

F. HOOD

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

14 Q Okay. Help me understand that.

15 So the workers who would have -- who
16 waxed and buffed the hallways were in the voluntary
17 work program, right?

18 A Yes.

19 Q And were they working during the day --
20 were they working other jobs during the day?

21 A Some might have been. They may have been
22 a trash detail worker, meaning they may come out for
23 15 to 30 minutes to take out trash. They weren't
24 working a full eight hours, but by them being already
25 assigned to a work detail, you weren't able to pay

F. HOOD

them twice.

Q All right.

A So you can only pay them one time a day.

So to compensate them for their voluntary work

program, we allow them to choose whether they want a

commissary item, an extra tray or phone time.

The only workers that worked the full eight hours were kitchen workers because they were on a shift. All the other work detail workers may have worked two, three hours a day.

Q Okay. So in that scenario you just gave, somebody is signed up as a -- in the voluntary work program as a trash --

A As a trash detail, yes, ma'am.

Q Right. And so when they worked taking out the trash, money is deposited in their account as the payment for their job as a trash worker, right?

A Yes, ma'am.

Q And then if that worker also waxes and buffs the hallways --

A Right.

Q -- they get to choose what their payment is, right?

A Well, they -- yeah, they could choose

1

F. HOOD

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

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F. HOOD

4

Q Okay. Do you know why detainees wanted

5

phone cards?

6

MR. LEE: Foundation.

7

THE WITNESS: No, I can't speak on

8

why a detainee would want phone time.

9

That's something that you'd have to ask

10

the detainee.

11

BY MS. SANDLEY:

12

Q Do you know why these detainees wanted to

13

work in the kitchen instead of the laundry?

14

MR. LEE: Objection.

15

THE WITNESS: Yeah, that's another

16

question you'd have to ask the detainee.

17

BY MS. SANDLEY:

18

Q Did the kitchen pay more than the

19

laundry?

20

A Yes.

21

Q Let's take this exhibit down, and let's

22

look at the next exhibit. We'll mark it No. 17, and

23

it's CCBVA 238482.

24

(Hood Deposition Exhibit No. 17 was

25

marked for the record.)

1 F. HOOD

2 more than an hour and a half, for sure,
3 and it may be closer to an hour.

4 THE WITNESS: We could power
5 through it.

6 (Brief pause.)

7 BY MS. SANDLEY:

8 Q All right, Mr. Hood. At Stewart, are
9 detainees expected to follow staff's orders?

10 A They are expected to follow the rules and
11 regulations of the detainee handbook, which are
12 enforced by the staff.

13 Q And is failure to obey a punishable
14 offense in the handbook?

15 A Yeah.

16 Q What are the possible consequences of
17 failure to obey?

18 MR. LEE: Object to form.

19 THE WITNESS: Could you repeat?

20 BY MS. SANDLEY:

21 Q What are the possible consequences of
22 failure to obey?

23 MR. LEE: Form.

24 THE WITNESS: Failure to obey, it
25 basically depends on the situation. You

C E R T I F I C A T E

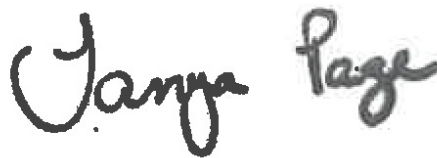
STATE OF GEORGIA:

FULTON COUNTY:

I hereby certify that the foregoing deposition was reported, as stated in the caption, and the questions and answers thereto were reduced to written page under my direction, that the preceding pages represent a true and correct transcript of the evidence given by said witness.

I further certify that I am not of kin or counsel to the parties in the case, am not in the regular employ of counsel for any of said parties, nor am I in any way financially interested in the result of said case.

Dated this 4th day of November,
2021.



Tanya L. Verhoven-Page,
Certified Court Reporter,
B-1790.